REMARKS

Claims 1-18 are pending in this application. Claims 1, 5, 7, 13 and 14 have been amended and claims 19-24 have been added by the present Amendment. Amended claims 1, 5, 7, 13 and 14 and new claims 19-24 do not introduce any new subject matter.

REJECTIONS UNDER 35 U.S.C. § 103

Reconsideration is respectfully requested of the rejection of: (1) claims 1-13 and 18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Pub. No. 2002/0122143 ("Woo") in view of European Patent Application Pub. No. 0827190 ("Chang") and U.S. Patent No. 5,089,750 ("Hatada"); (2) claims 14-16 under 35 U.S.C. § 103(a) as being unpatentable over Woo, Chang and Hatada as applied to claim 13, and further in view of U.S. Patent No. 6,380,559 ("Park"); and (3) claim 17 under 35 U.S.C. § 103(a) as being unpatentable over the combination applied to claim 14, and further in view of U.S. Patent No. 6,384,888 ("Komatsu").

Claims 1 and 7 have been amended to recite that the protrusion member and the insulating layer comprise substantially the same material. Claim 5 has been amended to recite that the protrusion member and the insulating member are simultaneously formed and comprise substantially the same material. Claim 13 has been amended to recite that the photoresist organic layer is patterned to simultaneously form an insulating layer in the pixel region and a protrusion member in the pad region. See, e.g., Applicants' disclosure, page 12, lines 16-21 (¶ 0062); and page 21, lines 7-15 (¶¶ 0103-104).

The Examiner maintains that Woo discloses patterning an insulation layer to

form an insulating layer in a pixel region. See June 14, 2007 Office Action at 14. The Examiner also admits that Woo fails to disclose a protrusion member disposed on an electrode pad, and relies on Chang to show that a photoresist organic layer is patterned to form a protrusion member. See id. at 4. However, in contrast to the claimed embodiments, the combination does not teach that the protrusion member and the insulating member comprise substantially the same material, and are simultaneously formed. Indeed, the two references separately disclose an insulating layer and a protrusion member, but there is no suggestion or teaching of the insulating layer and protrusion member in respective pixel and pad regions of a TFT substrate that comprise substantially the same material and that are simultaneously formed.

For at least this reason, Applicants respectfully submit that claims 1, 5, 7 and 13 are not rendered obvious by the combination of Woo, Chang and Hatada, when taken alone, or with Park and/or Komatsu.

Therefore, in view of the foregoing, Applicants respectfully submit that claims 1, 5, 7 and 13 are patentable over the cited references. In addition, for at least the reason that claims 2-4 depend from claim 1, claim 6 depends from claim 5, claims 8-12 depend from claim 7, and claims 14-18 depend from claim 13, claims 2-4, 6, 8-12 and 14-18 are also submitted to be patentable over the cited references.

As such, Applicants respectfully request that the Examiner withdraw the rejections of claims 1-18 under 35 U.S.C. § 103(a).

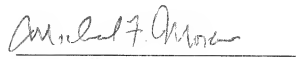
DEPENDENT CLAIMS

Applicants have not independently addressed the rejections of all the dependent claims because Applicants submit that for at least similar reasons as why the

independent claims from which the dependent claims depend are believed allowable as discussed, supra, the dependent claims are also allowable. Applicants, however, reserve the right to address any individual rejections of the dependent claims should such be necessary or appropriate.

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, the Examiner may telephone Applicants' Attorney to reach a prompt disposition of this application.

Respectfully submitted,



Michael F. Morano
Reg. No. 44,952
Attorney for Applicants

F. CHAU & ASSOCIATES, LLC
130 Woodbury Road
Woodbury, NY 11797
(516) 692-8888